

SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803

Lawrence J. Semenza, III, Esq., Bar No. 7174
Email: ljs@skrlawyers.com
Christopher D. Kircher, Esq., Bar No. 11176
Email: cdk@skrlawyers.com
Jarrod L. Rickard, Esq., Bar No. 10203
Email: jlr@skrlawyers.com
Katie L. Cannata, Esq., Bar No. 14848
Email: klc@skrlawyers.com
SEMENZA KIRCHER RICKARD
10161 Park Run Drive, Suite 150
Las Vegas, Nevada 89145
Telephone: (702) 835-6803
Facsimile: (702) 920-8669

Attorneys for Defendant Wild West Helicopters Inc.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

PAUL REIFFER,

Plaintiff,

vs.

WILD WEST HELICOPTERS INC.,

Defendant.

Case No. 2:23-cv-00032-RFB-EJY

**STIPULATION AND ORDER TO
EXTEND TIME TO RESPOND TO
COMPLAINT BY 30 DAYS**

[First Request]

This stipulation is entered into by Plaintiff Paul Reiffer ("Plaintiff"), by and through his counsel of record Trey A. Rothell, Esq., of Randazza Legal Group, PLLC, and Defendant Wild West Helicopters Inc. ("Defendant"), by and through its counsel of record Jarrod L. Rickard, Esq., of Semenza Kircher Rickard, with reference to the following facts and recitals:

1. Defendant was previously served with the Complaint filed by Plaintiff in this action;
2. On February 17, 2023, counsel for Defendant requested a 30-day extension of time to respond to the Complaint from counsel for Plaintiff;
3. Counsel for Defendant's request is based on the fact that he was just recently retained and requires time to get up to speed. Additionally, the Parties seek time to engage in

1 settlement discussions and wish to avoid the unnecessary incurrence of attorney's fees and use
2 judicial resources;

3 4. Based upon this request, the Parties have agreed to continue the deadline to
4 respond to the Complaint to March 17, 2023; and

5 5. Defendant has not previously requested an extension of the deadline to answer,
6 move or otherwise respond to the complaint.

7 NOW, THEREFORE, the parties hereby stipulate and agree, subject to Court approval, to
8 extend the date by which Defendant is required to answer, move, or otherwise respond to the
9 complaint to **March 17, 2023**.

10 Nothing in this stipulation shall be constructed as a waiver or relinquishment of any
11 party's rights, remedies, objections, or defenses, all of which are expressly reserved.

12 DATED this 22nd day of February, 2023.

DATED this 22nd day of February, 2023.

13 SEMENZA KIRCHER RICKARD

RANDAZZA LEGAL GROUP, PLLC

14
15 /s/ Jarrod L. Rickard

/s/ Trey A. Rothell

16 LAWRENCE J. SEMENZA, III, ESQ.

MARC J. RANDAZZA, ESQ.

17 Nevada Bar No. 7174

Nevada Bar No. 12265

18 CHRISTOPHER D. KIRCHER, ESQ.

TREY A. ROTHELL, ESQ.

19 Nevada Bar No. 11176

Nevada Bar No. 15993

20 JARROD L. RICKARD, ESQ.

4974 S. Rainbow Boulevard, Suite 100

21 Nevada Bar No. 10203

Las Vegas, Nevada 89118

22 KATIE L. CANNATA, ESQ.

Attorneys for Plaintiff Paul Reiffer

23 Nevada Bar No. 14848

24 10161 Park Run Drive, Suite 150

25 Las Vegas, Nevada 89145

26 *Attorneys for Defendant Wild West Helicopters*
27 *Inc.*

28 **IT IS SO ORDERED.**


UNITED STATES MAGISTRATE JUDGE

DATED: February 22, 2023

SEМЕНZA KIRCHER RICKARD
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